

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

IN RE: EQUIFAX INC.  
CUSTOMER DATA SECURITY  
BREACH LITIGATION

Case No. 1:17-md-2800-TWT

CONSUMER ACTIONS

**DECLARATION OF JENNIFER M. KEOUGH ENCLOSING  
OBJECTIONS AND OPT-OUT REQUESTS RECEIVED**

I, JENNIFER M. KEOUGH, declare as follows:

1. I am the Chief Executive Officer (“CEO”) of JND Legal Administration LLC (“JND”). The Court appointed JND as the Settlement Administrator<sup>1</sup> in its Order Directing Notice, dated July 22, 2019 (“Order”), to perform the duties set forth in the Settlement Agreement and Release (“Settlement Agreement”) in the above-captioned action (the “Action”). This Declaration is based on my personal knowledge, as well as upon information provided to me by experienced JND employees and counsel for the Plaintiffs and Defendants

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<sup>1</sup> Capitalized terms used and not otherwise defined herein shall have the meanings given such terms in the Settlement Agreement and Release.

(“Counsel”) in the Action, and if called upon to do so, I could and would testify competently thereto.

2. Attached hereto as Exhibit A is a true and correct copy of a chart identifying each objection received in the Action (the “Chart”).

3. Attached hereto as Exhibit B-1 through B-36 are true and correct copies of the objections submitted by the individuals identified in the Chart. The Chart is inclusive of any documents received by JND and includes objections that are potentially invalid as not meeting the requirements set forth in the Order.

4. Attached hereto as Exhibit C is a true and correct copy of a chart identifying a list of Settlement Class Members who submitted timely and valid exclusion requests to JND.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on December 5<sup>th</sup>, 2019, in Seattle, Washington.



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JENNIFER M. KEOUGH